

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,

vs.

BERNARD J. BEEBE,

Defendant

-----X

NOTICE OF MOTION

7:07-cr-00542-SCR

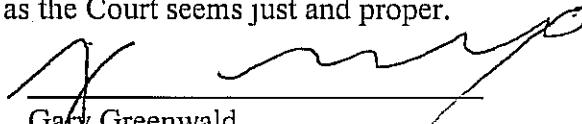
PLEASE TAKE NOTICE that, upon the affirmation of Gary Greenwald, Esq., dated the 12th day o f October 2007, the affidavit of Bernard J. Beebe sworn to the 12th day of October 2007, and upon the annexed papers and upon the papers and proceedings heretofore had herein, the undersigned will move this Court, at a Motion Term thereof, to be held at the Federal Courthouse, 300 Quarropos Street, White Plains, New York, on a date to be set by the Court, for the following relief:

1. An Order, pursuant to F.R.C.P. Rule 12(b)(3)(C), suppressing physical evidence upon the ground that such was obtained in violation of the defendant's rights under the Fourth Amendment, or in the alternative a hearing to determine the same; and

2. An Order, pursuant to F.R.C.P. Rule 12(b)(3)(C), suppressing statements attributed to the defendant upon the ground that such statements were obtained in violation of the defendant's rights under the Fifth and Sixth Amendments, or in the alternative a hearing to determine the same; and

Together with such other and further relief as the Court seems just and proper.

Dated: October 12, 2007



Gary Greenwald
Federal Bar Roll #GG4605
Attorneys for the Defendant
Greenwald Law Offices
99 Brookside Avenue
Chester, New York 10918

To: A.U.S.A. Richard Tarlowe
United States Attorney's Office
Southern District of New York
300 Quarropas Street
White Plains, New York 10601